

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

BOARD OF MANAGERS OF WEST PERRY  
CONDOMINIUM

Plaintiff,

-against-

ADMIRAL INDEMNITY COMPANY

Defendant.

Civil Action No.  
14 CV 3471 (SHS)

**AFFIDAVIT OF  
JODI STRUM  
IN OPPOSITION TO  
PLAINTIFF'S  
CROSS-MOTION  
TO STRIKE**

STATE OF NEW JERSEY    )  
                                      : ss  
COUNTY OF BERGEN     )

Jodi Strum, being duly sworn, deposes and says under penalty of perjury:

1. I am a Senior Underwriter employed by Clermont Specialty Managers ("Clermont"), which underwrites policies of insurance for Defendant ADMIRAL INDEMNITY COMPANY (hereinafter "ADMIRAL"). Our office address is 301 N. Route 17, Suite 900, Rutherford, NJ 07070.

2. In my role as an underwriter, I worked on the underwriting of the Admiral Policy which is the subject of this lawsuit.

3. I submit this Affidavit upon personal knowledge and in opposition to Plaintiff's Cross-Motion to Strike portions of the Affidavit of Jay Vigneaux submitted in support of ADMIRAL's Motion for Partial Summary Judgment, dated August 21, 2014.

4. It is my understanding that Plaintiff has taken issue with copies of certain emails sent to or by me that were attached as exhibits to Mr. Vigneaux's Affidavit; namely, (i) an October 8, 2012, email sent by me to Jeanette Napodano of Hub International, and (ii) a

November 28, 2012, email from Alex Seaman of Hub International to me and Jeanette Napodano. (*See Affidavit of Jay Vigneaux ¶¶ 13-15, Exhibits "B" and "C."*)

5. These are true and correct copies of the corresponding emails, which are part of the Clermont underwriting file, to which Mr. Vigneaux has access.

6. Accordingly, Plaintiff's cross-motion to strike the Affidavit of Jay Vigneaux submitted in support of ADMIRAL's Motion for Partial Summary Judgment should be denied.

  
JODI STRUM

Sworn to before me this 19<sup>th</sup>  
day of September, 2014

  
NOTARY PUBLIC

KATHY NAVARRA  
NOTARY PUBLIC, STATE OF NEW JERSEY  
ID# 2098946  
QUALIFIED IN BERGEN COUNTY  
COMMISSION EXPIRES AUGUST 14, 20 17